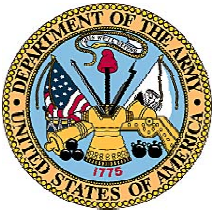


INSTALLATION MANAGEMENT AGENCY

IMA NEPA MANAGEMENT STRATEGY

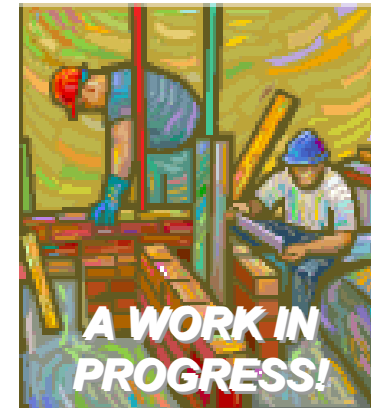
“Sustain, Support and Defend”

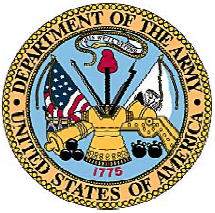


OUTLINE

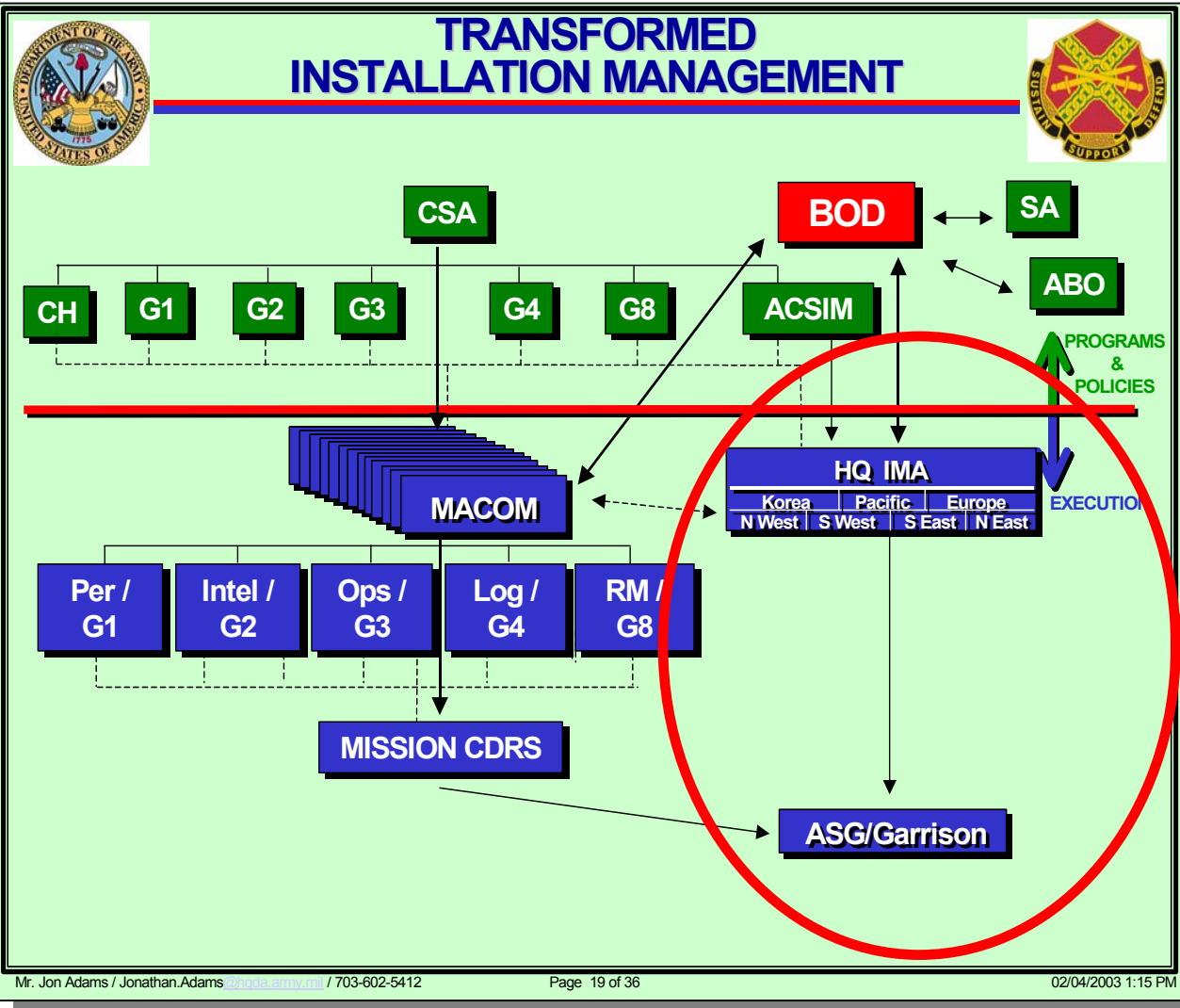


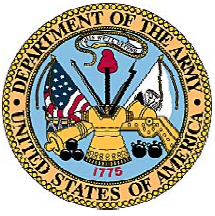
- **TERMS OF REFERENCE**
- **IMA NEPA MANAGEMENT GOALS**
- **NEPA COMPLIANCE REQUIREMENTS**
- **NEPA MANAGEMENT RESPONSIBILITIES**
- **LIST OF PROPOSED IMA ACTION ITEMS**
- **NEPA MANAGEMENT STATUS**
- **CONCLUSION**





WHAT MAKES UP THE INSTALLATION MANAGEMENT AGENCY?

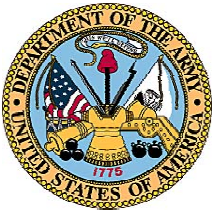




NEPA MANAGEMENT GOALS



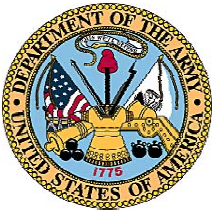
- **ENHANCE VALUE OF NEPA PROCESS TO ARMY'S DECISION-MAKING**
 - **USE AS PLANNING TOOL TO REDUCE ARMY'S BOTTOM LINE ENVIRONMENTAL COMPLIANCE COSTS, NOW AND FUTURE**
 - **MINIMIZE IMPACT OF ENVIRONMENTAL CONSTRAINTS ON ARMY'S MISSION CAPABILITIES**
- **ENSURE APPROPRIATE RESOURCES ARE PROVIDED TO PROPONENTS AND IMA FOR NEPA COMPLIANCE**
- **REDUCE NEPA COMPLIANCE COST**
 - **ORGANIZE NEPA EXPERTISE TO DETERMINE APPROPRIATE LEVELS OF ANALYSIS**
 - **DEVELOP AND INCORPORATE COST SAVING MEASURES**



NEPA COMPLIANCE REQUIREMENTS



- **APPLY WHEN MAJOR FEDERAL ACTION IS PROPOSED**
- **MAJOR ARMY ACTIONS TRIGGERING NEPA COMPLIANCE**
 - **MAJOR ACQUISITION**
 - **MILITARY TRAINING AND OPERATIONS**
 - **INSTALLATION MASTER PLANS**
 - **MILITARY CONSTRUCTION**
 - **BASE CLOSURE**
- **NEPA COMPLIANCE CONSISTS OF**
 - **EVALUATION OF ALTERNATIVES**
 - **ENVIRONMENTAL IMPACT ANALYSES**
 - **INTER-GOVERNMENTAL COORDINATION**
 - **PUBLIC INVOLVEMENT, AS REQUIRED**
 - **PREPARING DOCUMENTATION**

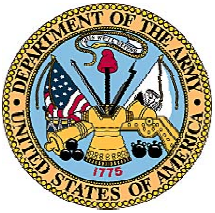


NEPA COMPLIANCE ROLES



- 1. PROPONENTS ARE ULTIMATELY RESPONSIBLE FOR MANAGING NEPA PROCESS AND ACHIEVING COMPLIANCE**
- 2. FUNCTIONAL ORGANIZATIONS PROVIDE COORDINATION & SUPPORT - IMA IS COORDINATING AGENCY TO PROPONENT AS IT PROVIDES INSTALLATION MANAGEMENT SUPPORT**
- 3. SUBJECT MATTER EXPERT TO PROVIDE NEPA PLANNING AND PROCESS MANAGEMENT, DATA COLLECTION, ANALYSES, AND PREPARATION OF NEPA DOCUMENTATION**

NEPA COMPLIANCE RESPONSIBILITIES VARY DEPENDING ON WHETHER YOU ARE A PROPONENT, FUNCTIONAL ORGANIZATION, OR SUBJECT MATTER EXPERT.

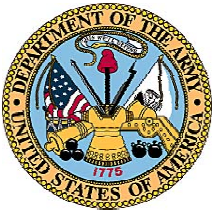


ARMY ACTIONS AND CORRESPONDING NEPA RESPONSIBILITIES



NEPA TRIGGERING ACTIONS	PROGRAMMATIC NEPA	SITE SPECIFIC NEPA	MITIGATION MEASURES
WEAPONS ACQUISITION	PROPONENT	IMA	TBD
MILITARY OPERATIONS	PROPONENT	PROPONENT/ IMA	TBD
INSTALLATION MASTER PLAN	IMA	IMA	IMA
BRAC*	?	?	?
MILCON	IMA	PROPONENT/ IMA	IMA

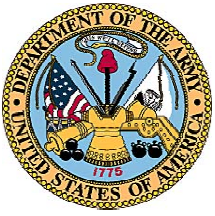
***PREVIOUS BRAC AUTHORIZATIONS WAIVED PROGRAMMATIC NEPA REQ'T**



IMA NEPA RESPONSIBILITIES



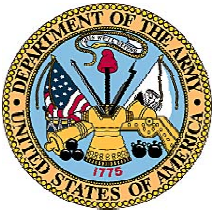
- **PROPONENT OF INSTALLATION MASTER PLANNING, MILCON, & TIERED SITE SPECIFIC ANALYSES**
- **COORDINATING AGENCY FOR MILITARY TRAINING, RANGE CONSTRUCTION AND WEAPONS PROGRAMS PROVIDING INSTALLATION MANAGEMENT SUPPORT**
- **PROVIDING NEPA PROCESS MANAGEMENT AND TECHNICAL SUPPORT FOR PREPARING AND STAFFING APPROPRIATE DOCUMENTS**



IMA PROPONENT RESPONSIBILITIES



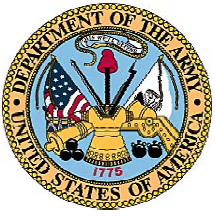
- **MANAGE OVERALL NEPA COMPLIANCE PROCESS**
 - **MONITOR DEVELOPMENT OF NEPA TRIGGERING ACTIVITIES AND ENSURE TIMELY COMPLIANCE**
 - **COORDINATE WITH FUNCTIONAL ORGANIZATIONS TO ENSURE THEIR SUPPORT**
 - **PREPARE AND SIGN ALL NECESSARY NEPA DOCUMENTS**
- **RECOMMEND BEST MANAGEMENT PRACTICES TO BE INCORPORATED INTO APPROPRIATE ARMY PUBLICATIONS TO ENSURE INFORMED DECISION-MAKING AND TIMELY COMPLIANCE**
- **FORECAST FUTURE IMA NEEDS AND BUILD BUDGET REQUESTS INTO THE PLANNING, PROGRAMMING, BUDGET & EXECUTION SYSTEM (PPBES) PROCESS**



IMA FUNCTIONAL COORDINATING AGENCY RESPONSIBILITIES



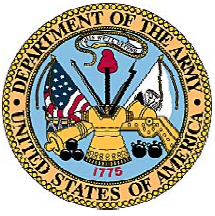
- **PROVIDE INSTALLATION MANAGEMENT SUPPORT AND FUNCTIONAL COORDINATION**
- **ASSIST IN PROPONENT'S PROGRAMMATIC NEPA PROCESS**
 - **WEAPONS PROGRAM**
 - **MILITARY TRAINING & EXERCISES**
 - **RANGE CONSTRUCTION**
- **ASSIST PROPONENT TO DEVELOP AND PROGRAM NEPA BUDGET REQUIREMENTS:**
 - **MITIGATION MEASURES REQUIRED UNDER NEPA**
 - **BASELINE ENVIRONMENTAL ANALYSES**
 - **IDENTIFY DATA GAPS**
 - **DATA COLLECTION AND IMPACT ANALYSES**
- **DETERMINE BEST WAYS TO SECURE FUNDS FOR NEPA COMPLIANCE - IMA VERSUS PROPONENT**



IMA SUBJECT MATTER EXPERT RESPONSIBILITIES



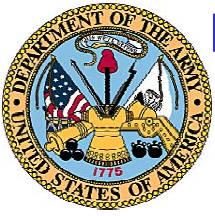
- **ESTABLISH CORE EXPERTISE TO MANAGE NEPA PROCESS FOR IMA'S NEPA TRIGGERING ACTIONS**
 - ASSIST INTEGRATING NEPA PROCESS INTO ARMY PPBES
 - ASSIST IN DETERMINING APPROPRIATE LEVEL OF ENVIRONMENTAL ANALYSES REQUIRED
- **APPLY CONTINUOUS PROCESS IMPROVEMENT CONCEPT TO IMPROVE INFORMED DECISION-MAKING AND REDUCE OVERALL COMPLIANCE COST**
 - INCORPORATE NEW TECHNOLOGIES AND METHODS
 - DEVELOP AND SHARE BEST MANAGEMENT PRACTICES
 - MAXIMIZE COST BENEFITS FROM ECONOMIES OF SCALE



PROPOSED IMA NEPA MANAGEMENT ACTION ITEMS



- **ASSIGN RESPONSIBILITIES FOR IMA (HQ, REGIONS, AND INSTALLATIONS)**
- **ESTABLISH IMA PROCESSES FOR NEPA MANAGEMENT AND COMPLIANCE**
 - **THRESHOLD FOR NEPA TRIGGERING ACTIONS**
 - **TIMING FOR COMMENCEMENT OF NEPA PROCESS – *PROJECT WISH LISTS SHOULD NOT TRIGGER NEPA***
 - **MASTER PLAN NEPA DOCUMENTS TO ELIMINATE SEPARATE MCA NEPA DOCUMENT**
 - **APPROPRIATE LEVEL OF NEPA DOCUMENTS AND ANALYSES REQUIRED**
 - **THRESHOLD FOR SIGNIFICANT IMPACTS REQUIRING PREPARATION OF EIS**
 - **COST-EFFECTIVE STANDARDIZED WAY TO COLLECT DATA AND TO SUPPORT BASELINE ENVIRONMENTAL ANALYSES**
 - **AVOID DUPLICATION OF EFFORT, BOTH INTERNAL AND EXTERNAL**
 - **INVEST IN DATA MANAGEMENT PROCESS TO CAPTURE EXISTING DATA TO AVOID DUPLICATION AND EASY ACCESS**

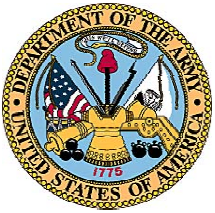


PROPOSED IMA NEPA MANAGEMENT ACTION ITEMS

CONTINUED



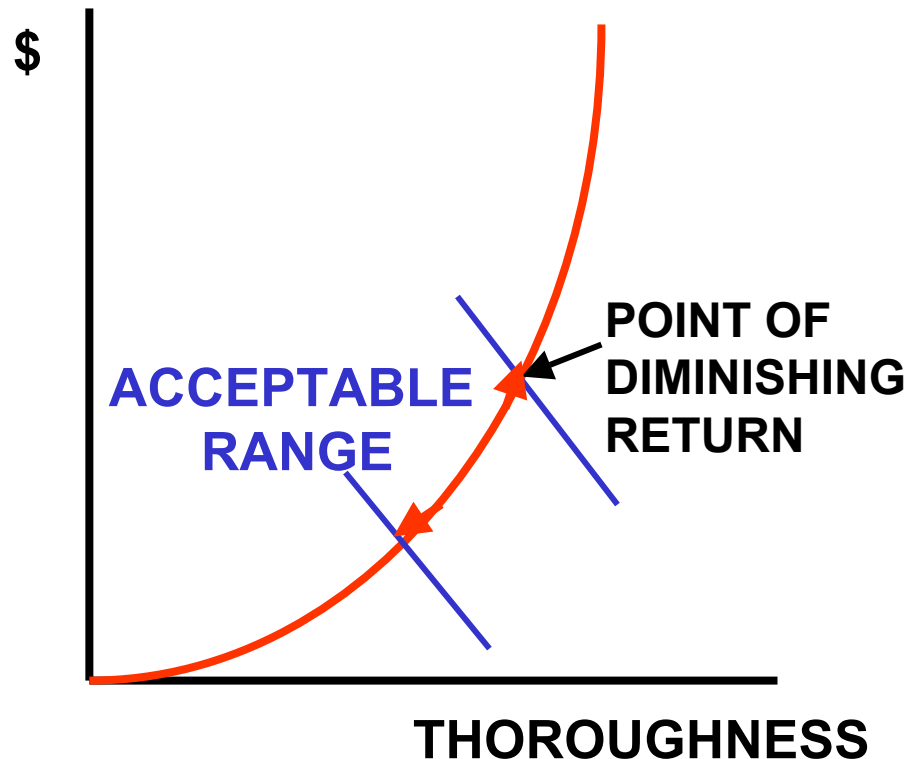
- **DEVELOP VARIOUS IN-HOUSE EXPERTISE AND NETWORK OF EXPERTISE FROM OTHER ORGANIZATIONS**
 - **ESTABLISH IMA NEPA TIGER TEAMS**
 - **IMA TEAM SUPPLEMENTED BY COE, AEC OR OTHER ARMY FUNCTIONAL EXPERTISE**
 - **ARMY TEAM SUPPLEMENTED BY EXPERTISE FROM OTHER GOVERNMENTAL AND NGO INSTITUTIONS SUCH AS UNIVERSITIES AND FOUNDATIONS**
- **DEVELOP MOST FLEXIBLE CONTRACTING OPTIONS FOR PREPARING NEPA DOCUMENTS**
 - **COST PLUS VS FIXED PRICE**
 - **CONSIDER TWO-STEP PROCESS: INITIAL FUNDING FOR SCOPING AND SUBSEQUENT FUNDING FOR PERFORMING APPROPRIATE LEVEL OF ANALYSIS**



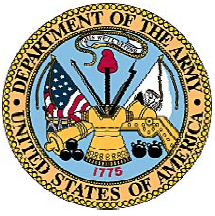
COST VS VALUE ADDED CURVE



CONCEPTUAL NEPA COST VS VALUE ADDED CURVE



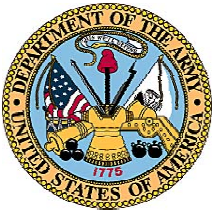
- IMA TO DEVELOP FUNCTIONAL EXPERTISES TO DETERMINE ACCEPTABLE RANGE ON THE VALUE CURVE
- ENSURE NEPA SOW LEVEL OF EFFORT REFLECTS IMA EXPERT JUDGEMENT
- COLLECTIVE NEPA EXPERIENCE AND IMA REGION FAMILIARITIES WITH LOCAL ISSUES ARE KEY TO DETERMINING MOST APPROPRIATE ANALYSES LEVEL



IMA BALANCING ROLE



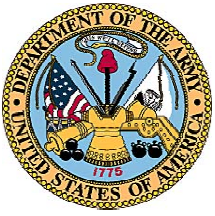
- **BALANCING BUDGET ACCOUNTABILITY AND NEPA COMPLIANCE RESPONSIBILITY MAY HELP TO COUNTER-BALANCE BIAS TOWARD OVER-SPENDING ON NEPA COMPLIANCE**
 - **RISK ADVERSE REVIEW GROUPS WITHOUT BUDGET ACCOUNTABILITY TEND TO BE OVER INCLUSIVE AND BIASED TOWARD MORE ANALYSES**
 - **PREPARING AN EXHAUSTIVE NEPA DOCUMENT TO PRECLUDE POTENTIAL LAWSUITS IS AN EXPENSIVE STRATEGY THAT TYPICALLY DOES NOT WORK**
 - **MISCONCEPTION: IMPACT ASSESSMENT METHOD BASED ON ENCYCLOPEDIA RATHER THAN ANALYTIC PROVIDES SUPERIOR COMPLIANCE RESULTS**
 - **CONTRACTED RESOURCES ARE OFTEN MISAPPLIED OR MISGUIDED; CREATING DUPLICATION OF EFFORT FROM UNCLEAR TASKING**



PROPOSED IMA ACTION ITEMS AS COORDINATING AGENCY



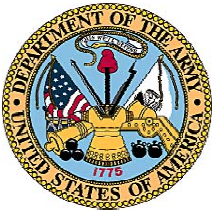
- **COORDINATE WITH PROPONENTS OF WEAPONS ACQUISITION AND MILITARY OPERATIONS**
 - DEVELOP INTERGRATED PROGRAMMATIC NEPA PROCESS
 - CLEARLY DEFINE RESPONSIBILITIES FOR TIERING
 - DEFINE BUDGET RESPONSIBILITIES FOR ACHIEVING COMPLIANCE – WORK OUT COST SHARING ARRANGEMENT
- **MONITOR PROPONENT NEPA TRIGGERING ACTIONS THROUGH PPBES/MDEP**
 - ENSURE THEIR NEW ENVIRONMENTAL COMPLIANCE REQUIREMENTS ARE NOT OVERLOOKED
 - DETECT AND FORECAST POTENTIAL COMPLIANCE ISSUES EARLY ENOUGH TO ENSURE MAXIMUM LATITUDE IN DEVELOPING MOST COST EFFECTIVE REMEDY



PROPOSED IMA ACTION ITEMS TO PROVIDE TECHNICAL SUPPORT



- **DEVELOP CORE NEPA PROCESS MANAGEMENT EXPERTISE**
 - **PROVIDE TIMELY NEPA PLANNING AND BUDGET INPUTS**
 - **DETERMINE APPROPRIATE LEVEL OF NEPA COMPLIANCE**
 - **SUPPORT INFORMED DECISION MAKING**
 - **MANAGE NEPA DOCUMENT PREPARATION EFFORT**
- **TEAM WITH COE, AEC, AND OTHER ARMY FUNCTIONAL EXPERTISE FOR ENVIRONMENTAL ANALYSES SUPPORT**
- **MEET PERIODICALLY TO SHARE EXPERIENCE AND RESOLVE ISSUES**
 - **HQ IMA SPONSOR CONFERENCES, IPRs**
 - **DEVELOP AND PROVIDE TRAINING AS NECESSARY**



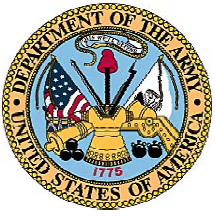
PROPOSED IMA NEPA DOCUMENTATION STANDARDIZATION APPROACH



MASTER PLAN														
MILITARY OPS														
MILCON														
ACQUISITIONS														
BRAC														
MEDIA	AIR QUALITY	WATER QUALITY	GEOLOGICAL IMPACT	NOISE	HYDROLOGY	HW/HM	SOCIO-ECONOMICS	CULTURAL RESOURCES	VEGETATION	WILDLIFE	ENDANGERED SPECIES	WETLANDS		OTHERS
DOCUMENTS														
REC														
PEA														
PEIS														
EA														
EIS														

**BASED UPON AIR FORCE CENTER OF
ENVIRONMENTAL EXCELLENCE MODEL**

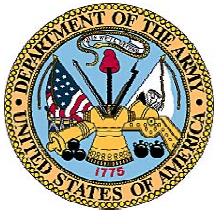
- **DETERMINE APPROPRIATE LEVEL OF ANALYSES REQUIRED FOR EACH SUBJECT BLOCK**
 - IMA EXPERTISE SUPPLEMENTED WITH VARIOUS NGO & ACADEMIC INSTITUTIONS
 - AD HOC EXPERTISE TO PRODUCE SOW FOR ANALYSES
- **STANDARDIZE DOCUMENTATION FORMAT**
 - DEVELOP SAMPLE DOCUMENTS
 - USE OF BOILERPLATED DOCUMENTS
 - FILL IN BLANKS WITH ANALYSES & FINDINGS
- **REFERENCE AVAILABLE DATA SOURCES**
 - MINIMIZE DUPLICATION OF EFFORTS
 - CROSS REFERENCE WITH OTHER MEDIA PROGRAMS



PROPOSED IMA PERFORMANCE METRICS



- **NUMBER OF VALID NEPA-BASED LEGAL CHALLENGES**
- **NUMBER OF COURT RULINGS ON COMPLIANCE VS NON-COMPLIANCE**
- **ASSESS VALUE OF NEPA COMPLIANCE AS PLANNING TOOL TO AVOID NEW EXPOSURE TO ENVIRONMENTAL COMPLIANCE REQUIREMENTS**
 - **POLLUTION PREVENTION**
 - **INCOPORATE SUSTAINABILITY CONCEPT**
 - **AVOIDING MITIGATION MEASURES**
- **BACKLOG OF UNFUNDED VALID NEPA REQUIREMENTS**
 - **BACKLOG OF ENVIRONMENTAL BASELINE ANALYSES**
 - **% OF MASTER PLAN ENVIRONMENTAL DOCUMENTATION COMPLETED AND THEIR ADEQUACY**
 - **PLANNED NEPA BUDGET VS ACTUAL EXPENDITURES**



SUMMARY



- **ARMY IS IN COMPLIANCE WITH NEPA**
 - NEPA IS NOT INTEGRATED EARLY IN THE PLANNING PROCESS; THEREFORE, VALUE ADDED TO PLANNING PROCESS MARGINAL
 - SPEND TOO MUCH ON STUDIES & DOCUMENTATION
- **ESTABLISHMENT OF IMA PROVIDES MECHANISM FOR ACHIEVING BETTER NEPA COMPLIANCE AT LOWER COST**
 - IMA IS THE PROPONENT FOR MANY NEPA-TRIGGERING ACTIVITIES
 - IF NOT THE PROPONENT, IMA IS THE COORDINATING AGENCY WITH A MAJOR ROLE
- **A SMALL GROUP OF NEPA EXPERTS WITHIN IMA CAN MAKE A DIFFERENCE**
 - MORE ACTIVE ROLE IN ARMY PPBES
 - BETTER GUIDANCE AND IMPLEMENTATION OVERSIGHT